REMARKS

The above amendment is made in response to the Office Action mailed January 8, 2004. Claims 1-24 are pending in the present application and stand rejected. Claim 1 has been amended. Claim 2 has been cancelled. The Examiner's reconsideration is respectfully requested in view of the above amendment and the following remarks.

Claims 1-3, 5-13 and 15-24 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Gillick et al (U.S. Patent No. 6,167,377) (hereinafter "Gillick"). Claims 1 has been amended to overcome the rejection. The rejections to independent claims 11 and 19 are respectfully traversed.

Amended claim 1 now incorporates the limitations of claim 2. Regarding claim 2, the Office Action cites col. 1, lines 8-13 of Gillick as anticipating "dividing text data." Applicants respectfully disagree. Col. 1, lines 8-13 of Gillick disclose dividing the *spoken utterance*. However, claim 1 separately recites "a word sequence uttered by a speaker" and "text data." Thus, the "text data" is distinguished from the spoken utterance in claim 1. This is further supported by the Specification, which states: "It is to be appreciated that the method of FIG. 4 presumes...*additional text data used to train the coefficients*." (Spec., p. 22, lines 16-19).

Even assuming, *arguendo*, that Gillick discloses "dividing text data," Gillick does not anticipate "dividing text data *for training a plurality of sets of coefficients* into partitions, depending on *word counts corresponding to each of the at least two language models*," as further claimed in claim 1. More specifically, the division of speech signals, as disclosed in Gillick, is not performed "for training a plurality of sets of coefficients," as claimed in claim 1. Further, the Office Action argues that a "time increment," as disclosed in Gillick, anticipates "word counts," as claimed in claim 1. A rejection under § 102

requires that each and every limitation be *expressly* disclosed within the prior art. Thus, it is respectfully submitted that such a substitution, without further explanation from the Examiner, is improper. Additionally, notwithstanding the above, the "time increment" disclosed in Gillick does not "*[correspond] to each of the at least two language models.*" Instead, the time increment of Gillick corresponds to the "frame." (Gillick, col. 1, lines 10-13: "In a frame-based system, a processor divides a signal descriptive of the speech to be recognized into *a series of digital frames, each of which corresponds to a small time increment of the speech.*").

Regarding claims 11 and 19, the Office Action cites the value *R* of Gillick as disclosing "each of the n-weights *depend on n-gram history counts*," as disclosed in claim 11. Applicants respectfully disagree. The value *R* refers to "a relevance factor used to control the contribution that the previous interpolation weights make to the new interpolation weights." (Gillick, col. 16, lines 42-44). The recited portions of Gillick does not disclose that the "interpolation weights" of Gillick "depend on n-gram history counts." Instead, the recited portions of Gillick, as shown above, disclose that new interpolation weights are based on old interpolation weights using the value *R*. As such, the Office Action does anticipate "each of the n-weights *depend on n-gram history counts*," as disclosed in claims 11 and 19.

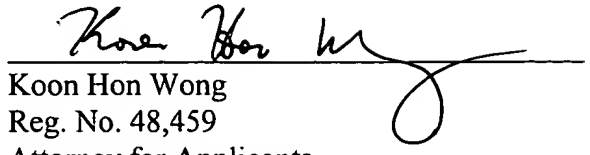
Notwithstanding the above, claim 19 is allowable for the following additional reason. The recited portions of Gillick provides that "the recognizer 215 employs four language models." (Gillick, col. 17, lines 39-41). Gillick further provides that the "recognizer 215...combines the scores produced by the language models using interpolation weights to produce a combined language model score for each word."

(Gillick, col. 16, lines 8-11). Also, as noted above, Gillick provides that the "recognizer 215 uses the relevance factor R to control the contribution that previous interpolation weights make to new interpolation weights." (Gillick, col. 16, lines 60-62). However, the recited portions of Gillick do not disclose that the recognizer "[*selects*] a weight vector to be used to combine the language model scores," as claimed in claim 19. As such, the "recognizer" of Gillick, as cited by the Office Action, does not anticipate "a selection device adapted to respectively and dynamically *select a weight vector* to be used to combine the language model scores."

Accordingly, claims 1, 11 and 19 are believed to be patentably distinguishable from Gillick. Dependent claims 3, 5-10, 12-13, 15-18 and 20-24 are believed to be allowable for at least the reasons given for claims 1, 11 and 19, as depending from allowable claims. Claims 4 and 14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Gillick in view of Goldenthal (U.S. Patent No. 6,625,749). Because claims 4 and 14 also depend from allowable claims 1 and 11, respectively, it follows that claims 4 and 14 are also believed to be allowable. Withdrawal of the rejection of claims 1 and 3-24 is respectfully requested.

In view of the foregoing remarks, it is respectfully submitted that all the claims now pending in the application are in condition for allowance. Early and favorable reconsideration is respectfully requested.

Respectfully submitted,

By: 

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